

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DOLORES GRANILLO, et al.,

Plaintiffs,

v.

FCA US LLC,

Defendant.

No. 3:16-cv-153-FLW-DEA

CLASS ACTION

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF THE CLASS ACTION SETTLEMENT**

For the reasons set forth in the accompanying Memorandum of Law submitted herewith, Plaintiffs respectfully request that this Court enter an Order:

(1) conditionally certifying a class action with respect to the claims against Defendants pursuant to Federal Rules of Civil Procedure Rules 23(a) and 23(b)(3) for the purpose of effectuating a class action settlement of the claims against Defendants; (2) preliminarily approving the settlement; (3) directing notice to Settlement Class Members consistent with the notice plan in the Settlement Agreement; (4) appointing Capstone Law APC as Class Counsel; and (5) scheduling a final approval hearing.

Dated: February 9, 2018

Respectfully Submitted,

Capstone Law APC

By: /s/ Jordan L. Lurie
Jordan L. Lurie

Tarek H. Zohdy
Cody R. Padgett
Karen L. Wallace
CAPSTONE LAW APC
1875 Century Park East, Suite 1000
Los Angeles, CA, 90067
jordan.lurie@capstonelawyers.com
tarek.zohdy@capstonelawyers.com
cody.padgett@capstonelawyers.com
karen.wallace@capstonelawyers.com

Howard Gutman
230 Route 206, Suite 307
Flanders, New Jersey 07836
howardgutman@aol.com

*Attorneys for Plaintiffs and the
Proposed Settlement Class*